

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

SCOTT TURNAGE, CORTEZ D. BROWN,
DEONTAE TATE, JEREMY S. MELTON, ISSACCA
POWELL, KEITH BURGESS, TRAVIS BOYD,
TERRENCE DRAIN and KIMBERLY ALLEN
on behalf of themselves and all similarly situated persons,

Plaintiffs,

v.

BILL OLDHAM, in his individual capacity as former
Sheriff of Shelby County, Tennessee; FLOYD BONNER,
JR., in his official capacity as Sheriff of Shelby County,
Tennessee; ROBERT MOORE, in his individual capacity
as former Jail Director of Shelby County, Tennessee;
KIRK FIELDS, in his official capacity as the Jail Director
of Shelby County, Tennessee; CHARLENE MCGHEE, in
her individual capacity as former Assistant Chief of Jail
Security of Shelby County, Tennessee; REGINALD
HUBBARD, in his official capacity as Assistant Chief of
Jail Security of Shelby County, Tennessee; DEBRA
HAMMONS, in her individual capacity as former Assistant
Chief of Jail Programs; TIFFANY WARD in her official
capacity as the Assistant Chief of Jail Programs of Shelby
County, Tennessee; SHELBY COUNTY, TENNESSEE,
a Tennessee municipality; TYLER TECHNOLOGIES,
INC., a foreign corporation; GLOBAL TEL*LINK
CORPORATION, a foreign corporation; SOFTWARE
AG USA, INC., a foreign corporation; SIERRA-CEDAR,
INC., a foreign corporation; SIERRA SYSTEMS GROUP,
INC., a foreign corporation, and TETRUS CORP, a foreign
Corporation,

Defendants.

Civil Action No. 2:16-cv-02907-
SHM-tmp

Jury Demanded

DECLARATION OF ROBERT E. CRADDOCK, JR.

I, Robert Craddock, declares as follows:

1. I am an adult resident of the State of Tennessee.
2. I have personal knowledge of the facts and information contained in this Declaration.
3. I am competent to testify as to the matters set forth herein.
4. I am a licensed attorney with the law firm of Wyatt, Tarrant & Combs, LLP.
5. I am one of the attorneys of record for the group of defendants in this case that are commonly referred to as the Shelby County Defendants.
6. On Monday, February 10, 2020, I was informed by Odell Horton, Jr., that Ed Raper had died.
7. Prior to Mr. Raper's death, I had no prior knowledge regarding Mr. Raper's health condition and had no reason to know Mr. Raper's health condition.
8. Mr. Raper never discussed any health condition with me.
9. I had no reason to know or discuss Mr. Raper's health condition.
10. If called to testify in this matter, I would provide the same information stated in this declaration.

Declaration under 28 U.S.C. § 1746

I declare under penalty of perjury that the foregoing is true and correct.

s/ Robert E. Craddock, Jr.
Robert E. Craddock, Jr.

Date: April 9, 2020